

1.300 Ste. Genevieve - L.O.W.
Silvanus Products, Inc.

RECEIVED

JAN 22 1996

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

RCOM SECTION

DIVISION OF ENVIRONMENTAL QUALITY

Southeast Regional Office

P.O. Box 1420 948 Lester Street Poplar Bluff, MO 63901-1420

(314)840-9750

FAX (314)840-9754

November 20, 1995

CERTIFIED MAIL: P 241 710 638
L.O.W. 95 SE011

Mr. Vernon Schwent
Production Manager
Silvanus Products, Inc.
40 Merchant St.
Ste. Genevieve, MO 63670

Dear Mr. Schwent:

On September 19, 1995, Albert R. Wampler, representing the Missouri Department of Natural Resources, Southeast Regional Office, conducted an inspection at the Silvanus Products, Inc., facility located in Ste. Genevieve, Missouri. This inspection was made to determine if Silvanus Products, Inc., was in compliance with the Federal Resource Conservation and Recovery Act of 1976, as amended, the Missouri Hazardous Waste Management Law and applicable state and federal regulations promulgated thereunder. Authority to conduct such inspections has been granted under Section 260.375(9) and 260.377 RSMo. Any federal regulations cited are those adopted by reference in state regulations or those for which the state has agreed to pursue enforcement action.

During this inspection, violations of Missouri's Hazardous Waste Management Law and Regulations were found. The unsatisfactory features noted have been listed below.

1. "No Smoking" signs were not conspicuously placed by ignitable or reactive wastes. 10 CSR 25-5.262(2)(C) 2.D.(II).
2. The beginning date of accumulation was not marked on the drums of waste used as satellite storage. 10 CSR 25-5.262(2)(C) 3.
3. The emergency coordinator's name and telephone number were not posted by a telephone. 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(5)(ii).

RCRA Records Center
R00025280

4. The telephone number of the fire department was not posted by a telephone. 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d) (5) (ii).
5. The location of the fire extinguishers and spill control equipment was not posted near a telephone. 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d) (5) (ii).
6. Failure to document a consecutive shipment number on all manifests for hazardous waste. 10 CSR 25-5.262(2) (B)2.A.

Note that Missouri manifest document number 00047 dated April 4, 1995, shows that the consecutive shipment number 0044 was used. Missouri manifest document number 00048 dated April 27, 1995, shows that the consecutive number used was 0048. (See attachment #1.)

In order for Silvanus Products, Inc., to return to compliance with Missouri's Hazardous Waste Management Law and Regulations, each listed unsatisfactory feature should be addressed. Corrective actions are believed to be self-explanatory. Documentation showing that corrective actions have been made should be mailed within thirty (30) days of the receipt of this letter to the Department of Natural Resources, Hazardous Waste Program, Attn: Kathy Flippin, Chief, Hazardous Waste Enforcement Unit, P.O. Box 176, Jefferson City, MO 65102 and the Department of Natural Resources, Regional Director, Southeast Regional Office, P.O. Box 1420, Poplar Bluff, MO 63902.

Should you have any questions concerning this inspection, please contact Albert R. Wampler at our Southeast Regional Office at (314) 840-9750.

Sincerely,



Gary L. Gaines, P.E.
Regional Director

GLG:aws

Enclosure

c: Kathy Flippin, HWMP

ATTACHMENT #1

5-0-01

INSTRUCTIONS FOR THE COM-
PLETION OF THIS FORM ARE ON
REVERSE SIDE
THIS DOCUMENT MUST BE USED
FOR ALL MISSOURI-DESTINED
SHIPMENTS

MISSOURI DEPARTMENT OF NATURAL RESOURCES
Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

Page 5 of 11

EMERGENCY RESPONSE
U.S. COAST GUARD
1-800-424-8802
CHEM TREC
1-600-424-9300
DEPT. OF NATURAL RESOURCES
314-634-2456

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-Pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MOD 092351642		Manifest Document No. 100647		2. Page 1 of 1		Information in the shaded areas is required by State Law.	
3. Generator's Name and Mailing Address SILVANUS PRODUCTS INC PO BOX 427 ST GENEVIEVE MO 63670						A. Missouri Manifest Document Number 001659 0044			
4. Generator's Phone (314) 883-3521						B. G.S.I. (Gen. Site Address) 40 MERCHANT ST			
5. Transporter 1 Company Name SAFETY-KLEEN CORP.						6. US EPA ID Number MOD 000669051			
7. Transporter 2 Company Name						8. US EPA ID Number			
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 201 LASALLE STREET CAPE GIRARDEAU, MO 63701						10. US EPA ID Number MOD 000669051			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID NUMBER)						12. Containers		13. Total Quantity	
a. WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII(D001) (D006, D008, D018, D035, D039, D040) (ERG#27)						1 DF		4 G	
b.								EPA WASTE CODE D001 STATE	
c.								EPA WASTE CODE STATE	
d.								EPA WASTE CODE STATE	
J. Additional Descriptions for Materials Listed Above						K. Handling Code (Facility Use Only)			
a. D039 D018 D006, D008, D035, D040, 6.7#G 3.4.2B						Interim Final Comments S02 T54 REDISTILLATI			
b.						c.			
c.						d.			
15. Special Handling Instructions and Additional Information IF UNDELIVERABLE, RETURN TO GENERATOR. EMERGENCY RESP#708-888-4660 24HR. SKDOT# A: 501 B: C: D:									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name VERNON T SCHWART				Signature <i>Vernon T Schwart</i>				Month Day Year 10/10/95	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Michael R. BGS</i>				Month Day Year 10/10/95	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature				Month Day Year	
19. Discrepancy Indication Space NO DISCREPANCY									
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Wanda Bowers									
Signature <i>Wanda Bowers</i>				Month Day Year 10/10/95					

5-030-01

INSTRUCTIONS FOR THE COM-
PLETION OF THIS FORM ARE ON
REVERSE SIDE.THIS DOCUMENT MUST BE USED
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MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality
Waste Management ProgramP.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

HAZARDOUS WASTE MANIFEST

Page 6 of 11

EMERGENCY RESPONSE
U.S. COAST GUARD
1-800-424-8802
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DEPT. OF NATURAL RESOURCES
314-634-2436

Please print or type (Form designed for use on elite (12-Pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MOD 092351642		Manifest Document No. 00048		2. Page 1 of 1		Information in the shaded areas is required by State Law.	
3. Generator's Name and Mailing Address SILVANUS PRODUCTS INC PO BOX 427 ST GENEVIEVE MO 63670						A. Missouri Manifest Document Number 001659 00048			
4. Generator's Phone 314 883-3521						B. G.S.I. (Gen. Site Address) 40 MERCHANT ST			
5. Transporter 1 Company Name SAFETY-KLEEN CORP.						6. US EPA ID Number MOD 000669051			
7. Transporter 2 Company Name						C. MO. Transporter's ID H-1273p3909316			
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 201 LASALLE STREET CAPE GIRARDEAU, MO 63701						10. US EPA ID Number MOD 000669051			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID NUMBER)						12. Containers		13. Total Quantity	
a. WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII(D001) (D006, D008, D018, D035, D039, D040) (ERG#27)						2		DM 16	
b. RO WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII(D001) (D006, D008, D018, D035, D039, D040) (ERG#27)								DM C	
c.									
d.									
J. Additional Descriptions for Materials Listed Above						K. Handling Code (Facility Use Only)			
a. D039 D018 D006, D008, D035, D040, 6.7#G 5.6, -8						Interim S02 T54 Final REDISTILLATI			
b. D039 D018 D006, D008, D035, D040, 6.7#G						Interim S02 T54 Final REDISTILLATI			
c.						c.			
d.						d.			
15. Special Handling Instructions and Additional Information 9517 80395593 199886 5-030-01-9103 02 IF UNDELIVERABLE, RETURN TO GENERATOR. LINE 11B NOT USED EMERGENCY RESP#708-888-4660 24HR. SKDOT# A: 501 B: -585 C: D:									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name Vernon T Schwartz						Signature <i>Vernon T Schwartz</i>		Month Day Year 10/4/95	
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>Michael Riggs</i>		Month Day Year 10/4/95	
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature <i>Wanda Bowers</i>		Month Day Year 10/4/95	
19. Discrepancy Indication Space									
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name Wanda Bowers						Signature <i>Wanda Bowers</i>		Month Day Year 10/4/95	

INSTRUCTIONS FOR THE COM-
PLETION OF THIS FORM ARE ON
REVERSE SIDE.

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Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
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page 8 of 11

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DEPT. OF NATURAL RESOURCES
314-634-2436

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-Pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MOD092351642	Manifest Document No. 00049	2. Page 1 of 1	Information in the shaded areas is required by State Law.	
3. Generator's Name and Mailing Address SILVANUS PRODUCTS, INC. 40 MERCHANT STREET STE. GENEVIEVE MO 63670 4. Generator's Phone 314 883-3521				A. Missouri Manifest Document Number 001659 B. G.S.I. (Gen. Site Address) SAME		
5. Transporter 1 Company Name SAFETY-KLEEN CORPORATION		6. US EPA ID Number MOD000669051		C. MO. Transporter's ID H-1273 P39093IL		
7. Transporter 2 Company Name SCHNEIDER TANK LINE		8. US EPA ID Number WID980904742		D. Transporter's Phone 314-335-1616		
9. Designated Facility Name and Site Address SAFETY-KLEEN CORPORATION 3700 LAGRANGE ROAD SMITHFIELD, KENTUCKY 40068		10. US EPA ID Number KYD053348108		E. MO. Transporter's ID H-1431 723-3441L F. Transporter's Phone 800-558-6623 G. State Facility's ID RRKY02 H. Facility's Phone 502-845-2453		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID NUMBER)				12. Containers	13. Total Quantity	14. Unit Wt/Vol.
a. COMBUSTIBLE LIQUID, N.O.S. (ALIPHATIC HYDROCARBONS) NA1993 PG III (ERG#27) (NOT USEPA HAZARDOUS WASTE)				1	603	P
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Code (Facility Use Only)		
a. Sample #617528 Control #232323 S.G. 1.04				Interim Final Comments		
b.				501/150		
c.						
d.						
15. Special Handling Instructions and Additional Information 5-030-01-9328 EMERGENCY RESPONSE NUMBER 708-888-4660 (24 HR) IF UNDELIVERABLE, RETURN TO GENERATOR SK DOT #: a. 3065						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name JIM VAETH		Signature Jim Vaeth		Month Day Year 06/02/95		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Steve Smith		Signature Steve Smith		Month Day Year 06/02/95		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name B. J. St. CLAIR		Signature B. J. St. Clair		Month Day Year 06/05/95		
19. Discrepancy Indication Space 12 A ROWS DM 13135						
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Becky Benham Signature Becky Benham Month Day Year 06/06/95						

THIS COULD BE FINAL COPY - PART 1
THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED FACILITY THEN TRANSMITTED TO THE DEPARTMENT BY THE GENERATOR

ATTACHMENT #2



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
SMALL QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

S

SQG-INSP.

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME SILVANUS PRODUCTS, INC.		DATE SEPTEMBER 19, 1995	EPA I.D. NUMBER MO0092351642
ADDRESS 40 MERCHANT ST		RR NO. NONE	MO I.D. NUMBER 001657
CITY STE GENEVIEVE	NUMBER OF EMPLOYEES 180	YEARS AT SITE ~ 50 YEARS	TELEPHONE NUMBER 314-883-3521
FACILITY REPRESENTATIVE(S), TITLE(S) VERNON SCHWENT - Production MGR. PAUL HARMON - SAFETY - INSPECTOR.			
DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT			

BOOK BINDING-PRINTING AND SILK SCREENING.

WASTE STREAMS

	DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1.	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAFTHA) NA 1993 PG III (D001) parts washer maintenance in parts operations D006, D008, D035, D039, D040 D01P	52# QTR 17# MO	D001 D008 D040 D006 D035 D039 D01P	SAFETY- CLEAN
2.	WASTE COMBUSTIBLE LIQUID N.O.S. (petroleum NAFTHA) D006 D008 D01P, D035, D039, D040 parts washer printing operations NA 1993 PG III (D001)	282# QTR 94# MO	D001 D035 D006 D039 D008 D040	SAFETY- CLEAN
3.	COMBUSTIBLE LIQUID N.O.S. (ALIPHATIC HYDROCARBONS) NA 1993 PG III (UV INKS) NON-REGULATED (WASTE)	603# 202# QTR	NONE	SAFETY- CLEAN
4.	RG WASTE FLAMMABLE SOLIDS, N.O.S. (ALIPHATIC AND AROMATIC HYDROCARBONS) 4.1 UN 1325 PG II D001 LITHO RAGS	395# 132# MO	D001	SAFETY- CLEAN
5.	RG WASTE FLAMMABLE LIQUIDS (PROPYLENE GLYCOL METHYL ETHER) SILK SCREEN RAGS 3 UN 1993 PG II D001	1238# 413# QTR	D001	SAFETY- CLEAN

CHECK ALL THAT APPLY (Specify if possible)

- | | | |
|---------------------------------------|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries | <input type="checkbox"/> POTW |
| <input type="checkbox"/> Septic Tank | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill |

A. GENERAL

<input checked="" type="checkbox"/>	Registered as a HW Generator - Section 260.380 (1) RSMo and 10 CSR 25-5.262 (2)(A)	GCF
<input checked="" type="checkbox"/>	Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GCF
<input checked="" type="checkbox"/>	Utilizes a licensed hazardous waste transporter - Section 260.380 (6) RSMo	GCF
<input checked="" type="checkbox"/>	Utilizes authorized HW TSD or RR facility - Section 260.380 (7) RSMo	GCF
<input checked="" type="checkbox"/>	Facility does not operate as a TSD - Section 260.390 (1) RSMo	GCF

COMMENTS**PART 1: WALK-THROUGH INSPECTION****B. PRETRANSPORT, CONTAINERIZATION & STORAGE**

<input type="checkbox"/>	Storage does not exceed 180 days (270 days if transported > 200 miles) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e)	ASO
<input type="checkbox"/>	Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171	GPT
<input type="checkbox"/>	Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172	GPT
<input type="checkbox"/>	Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a)	GPT
<input type="checkbox"/>	Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c)	GPT
<input type="checkbox"/>	Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262 (2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265 (2)(I)3.	GOR
<input type="checkbox"/>	Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262 (2)(C)1.	GOR
<input type="checkbox"/>	Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2)	GPT
<input type="checkbox"/>	Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(II)	GOR
<input type="checkbox"/>	Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(I) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)	GPT
<input checked="" type="checkbox"/>	Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II)	GPT
<input checked="" type="checkbox"/>	Daily inspection of areas subject to spills, ie. waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR
<input checked="" type="checkbox"/>	Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35	GPT
<input checked="" type="checkbox"/>	Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT
<input type="checkbox"/>	"No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)	GOR
<input checked="" type="checkbox"/>	Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR

COMMENTS

NO HAZARDOUS WASTE IN PRIMARY STORAGE AREA

NONE INCOMPATIBLE

NONE IN STORAGE

NONE INCOMPATIBLE WASTES

NONE IN STORAGE

NONE IN STORAGE

NONE IN STORAGE

INSIDE STORAGE AREA

NONE IN STORAGE

NONE IN STORAGE

C. SATELLITE ACCUMULATION

<input checked="" type="checkbox"/>	Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173	GPT
<input checked="" type="checkbox"/>	Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171	GPT
<input checked="" type="checkbox"/>	Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172	GPT
<input checked="" type="checkbox"/>	Quantities accumulated not exceeding 55 gal. (1 quart of acutely hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT
<input checked="" type="checkbox"/>	Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)3.	GPT
<input type="checkbox"/>	Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.	GOR

COMMENTS

FIXER - DOLL PROCESSING PHOTO-FILM
RAGS - DOLL - OFFSET PRINTING -
RAGS DOLL SILK SCREEN -

Container NO - BEGINNING DATE

7. <input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	COMMENTS
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D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33		COMMENTS
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34 (d)(4) referencing 40 CFR 265 Subpart C.	GPT	
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)	GPT	
4. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33	GPT	
5. <input checked="" type="checkbox"/> Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
6. <input checked="" type="checkbox"/> Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
7. <input checked="" type="checkbox"/> Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
8. <input checked="" type="checkbox"/> Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ	
9. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)	GPT	
10. <input checked="" type="checkbox"/> Telephone or two-way radio onsite and capable of summoning local fire or police dept. - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)	GPT	

NO WASTE AT SITE BUT A TELEPHONE IN ROOM FOR STORAGE.

E. SQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.	NO WASTE STORED IN TANKS.			
2.				
3.				

1. <input checked="" type="checkbox"/> Covered tanks have 2" floorboard or confinement system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.201(a)(1)		COMMENTS
2. <input checked="" type="checkbox"/> Confinement for tanks equipped with a leak detection system or double containment system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.201(a)(2)		
3. <input checked="" type="checkbox"/> Waste and/or treatment method is compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.201(a)(3)		
4. <input checked="" type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.201(a)		
5. <input checked="" type="checkbox"/> Ignitable or reactive wastes rendered safe/proTECTED from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.201(a)(4)		
6. <input checked="" type="checkbox"/> Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.201(a)(5)		
7. <input checked="" type="checkbox"/> Tanks with vapor pressure > 40 mm Hg @ 25 °C not placed in open tanks - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.201(a)(6)		
8. <input checked="" type="checkbox"/> Tanks and treatment equipment kept free and unobstructed and painted properly upon disposal - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.201(a)(7)		
9. <input checked="" type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).	GPT	

10. <input checked="" type="checkbox"/> Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)	GPT	COMMENTS
11. <input checked="" type="checkbox"/> Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5	GPT	
12. <input checked="" type="checkbox"/> Waste oil tanks in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR	

PART 2: RECORDS INSPECTION

F. MANIFESTS

<input checked="" type="checkbox"/> Facility uses manifest system or wastes reclaimed under contractual agreement - 260.380-1(b) RSMo and 10 CSR 25-5.262(2)(B)	GMR
2. <input checked="" type="checkbox"/> Generator maintains a copy of the contractual agreement on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2)	GMR
3. <input checked="" type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR
4. <input checked="" type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR
5. <input checked="" type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A	GOR
6. <input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	GMR
7. <input checked="" type="checkbox"/> All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#s - 10 CSR 25-5.262(2)(B)2.	GMR
8. <input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)1.	GMR
9. <input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - If required) - 10 CSR 25-5.262(2)(B)2.	GMR
10. <input checked="" type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR
11. <input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.	GMR
12. <input checked="" type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A	GOR
13. <input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1	GOR
14. <input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C	GRR
15. <input checked="" type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1	GOR
16. <input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
17. <input checked="" type="checkbox"/> "Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement & retained on-site for 5 years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
18. <input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB

COMMENTS

Each manifest needs consecutive shipment number

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G. PREPAREDNESS AND PREVENTION

1. <input checked="" type="checkbox"/> Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37	GPT
2. <input checked="" type="checkbox"/> Emergency coordinator(s) on premise or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i)	GSQ

COMMENTS

H. WASTE OIL

<input checked="" type="checkbox"/> Waste oils managed properly and not disposed of into the environment - 10 CSR 25-11.010(3)(B)	GOR
<input checked="" type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(3)(C)2	GOR
3. <input type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR
4. <input checked="" type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR
5. <input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR

COMMENTS

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NEED

I. RESOURCE RECOVERY

1. <input checked="" type="checkbox"/> N/A RR certification for energy recovery or reclamation of waste oil or hazardous waste on site - 10 CSR 25-9.020(3)(A)3	GOR	COMMENTS
2. <input checked="" type="checkbox"/> N/A Still bottom or RR residue disposed properly - Section 260.38(1)(5) RCRA	GOR	
3. <input checked="" type="checkbox"/> N/A Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A).	GOR	
4. <input checked="" type="checkbox"/> N/A Facility meets the operating conditions of certification - 10 CSR 25-9.020(3).	GOR	
5. <input checked="" type="checkbox"/> N/A Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E)1 and 2.	GOR	
6. <input checked="" type="checkbox"/> N/A Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR	
7. <input checked="" type="checkbox"/> N/A Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR	
8. <input checked="" type="checkbox"/> N/A Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR	

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

INSPECTOR'S SIGNATURE

Albert R. Wampler

DATE

9/19/85

ATTACHMENT #3